

BROWN AND SEELYE PLLC
Ellen Ann Brown Esq.
Susan H. Seelye Esq.
1700 Cooper Point Rd SW #C5
Olympia, WA 98502
Telephone 253-573-1958
Facsimile 253-274-1200

HONORABLE MARY JO HESTON
HEARING DATE: March 24, 2020
TIME: 1:00 pm
RESPONSE DATE: March 17, 2020
Chapter 13
Tacoma, WA

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT COURT OF WASHINGTON**

Re

MICHAEL FLOYD SANDERS

Debtor(s)

**In Chapter 13 Proceeding
No. 20-40150-MJH**

**RESPONSE TO TRUSTEE'S
OBJECTION TO CONFIRMATION**

COMES NOW the above-referenced debtor(s) through their attorneys of record and states:

The Debtor has amended his Chapter 13 Plan to remove the Section 1.B to resolve the Trustee's objection and has provided the Trustee with a copy of the Debtor's registration on her vehicle showing she is the only party on the registration and the lienholder on the vehicle. Bank statements have been provided to the Trustee and Schedules A/B and C have been amended and the liquidation value has been updated in the Amended Plan.

The Debtor requests that his case be confirmed.

Dated March 16, 2020

/s/ Ellen Ann Brown

ELLEN ANN BROWN WSB#27992
Attorneys for Debtor(s)